

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO.
	:	1:11-CR-127-AT
	:	
LAWRENCE EPPELBAUM	:	

**MOTION FOR EXTENSION OF TIME TO FILE  
PRETRIAL MOTIONS AND TO CONTINUE PRETRIAL CONFERENCE**

Defendant Lawrence Eppelbaum (“Dr. Eppelbaum”), through the undersigned counsel, files this Motion for Extension of Time to File Pretrial Motions and to Continue Pretrial Conference pursuant to Local Criminal Rule 12.1(B). In support of this Motion, Dr. Eppelbaum states as follows:

1. Dr. Eppelbaum’s Arraignment was held on March 28, 2011.
2. On March 30, 2011, the Government produced two disks containing over 15,000 pages of documents. These items need to be reviewed in order for counsel to file any appropriate pretrial motions. The undersigned counsel is working in earnest to review the materials but has not reviewed the items in full. Counsel has, however, determined that the Government has not yet provided Dr. Eppelbaum with an

inventory of all of the items seized from him by law enforcement officials which the Government expects to introduce at trial.

3. Pursuant to Local Criminal Rule 12.1(B), Dr. Eppelbaum has fourteen days within which to file pretrial motions. Thus, the current deadline is April 18, 2011—the same date on which the pretrial conference is currently scheduled.
4. Pursuant to Local Criminal Rule 12.1(B), a magistrate judge may, for good cause, extend the filing time for one fourteen-day period.
5. Since Dr. Eppelbaum did not receive the Government's disks until March 30, 2011, and in light of the voluminous nature of the discovery and the need to review the materials to determine whether pretrial motions are necessary to Dr. Eppelbaum's defense, Dr. Eppelbaum requests one fourteen-day extension for the filing of any pretrial motions.
6. This Motion is not sought for any improper purpose or for the purpose of delaying these proceedings.
7. The undersigned has conferred with Assistant United States Attorney Kurt Erskine, and he indicated that the Government does not oppose this continuance.

**WHEREFORE**, Dr. Eppelbaum respectfully requests one fourteen-day extension for the filing of any pretrial motions and requests that the Court continue the pretrial conference in this case to a date after May 2, 2011.

Dated: April 4, 2011

Respectfully submitted,

/s/ Keisha O. Coleman

Byung J. Pak

Bar No. 559457

Keisha O. Coleman

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*Attorneys for Dr. Lawrence Eppelbaum*

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**CERTIFICATE OF SERVICE AND COMPLIANCE**

I hereby certify that the foregoing was prepared in Times New Roman 14-point font in conformance with Local Rule 5.1C and that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record, including:

Kurt R. Erskine  
Steven D. Grimberg  
Assistant United States Attorneys

Dated: April 4, 2011

\_\_\_\_\_  
/s/ Keisha O. Coleman

Keisha O. Coleman  
Bar No. 844720

*Attorney for Dr. Lawrence Eppelbaum*